

EXHIBIT A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

DIBRA DJULIJA,

Plaintiff,

-vs-

SCHNEIDER NATIONAL CARRIERS,
INC. and BOBBY JOE BILLINGS,

Defendants.

COMPLAINT AT LAW

NOW COMES the Plaintiff, by and through his/her attorneys, LAW OFFICES OF
STEPHEN G. PINTO LTD., complaining against each Defendant, and states as follows:

1. That on September 5, 2007 plaintiff operated a certain motor vehicle at or near Interstate 94 and Wilson Avenue and the Wilson Avenue exit in Chicago, Illinois.
2. That on the above date defendant BILLINGS, employee or agent of defendant SCHNEIDER, was the driver of and controlled a certain motor vehicle upon said roadways.
3. While driving on said roadways, BILLINGS, and SCHNEIDER as BILLING's master, owed plaintiff a duty of reasonable care in operation of said vehicle.
4. BILLINGS, acting in the scope of his employment or agency with SCHNEIDER, breached said duty by committing one or more of the following negligent acts or omissions:
 - a. Drove said vehicle at a greater rate of speed than was reasonable and proper for the conditions and circumstances of said roadway, contrary to and in violation of Chapter 95 1/2, Section 11-601 of the Illinois Revised Statutes;
 - b. Failed to keep said vehicle under sufficient and proper control;
 - c. Failed to keep a proper lookout for other vehicles upon said roadway, including plaintiff's vehicle;

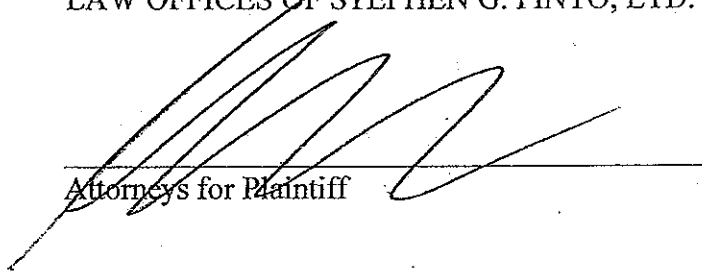
- d. Failed to yield the right of way to oncoming traffic;
- e. Failed to yield the right of way to plaintiff's vehicle;
- f. Struck plaintiff's vehicle;
- g. Turned in front of plaintiff's vehicle when it was not safe to do so;
- h. Failed to observe and obey traffic control devices for the roadways;
- i. Failed to observe and obey roadway markings;
- j. Failed to reduce speed to avoid an accident;
- k. Failed to maintain a safe following distance in relation to other vehicles, including plaintiff's vehicle;
- l. Stopped suddenly without cause;
- m. Drove and maneuvered aggressively; and
- n. Failed to take appropriate evasive action to avoid an accident.

5. As a result of the aforesaid negligent acts and omissions, the defendants' vehicle collided with plaintiff's vehicle causing injuries and damages to plaintiff.

6. That as a direct and proximate result of one or more of the aforesaid acts of negligence or omissions on the part of the defendants, the plaintiff sustained severe and permanent disabling injuries and suffered acute and prolonged physical and mental pain and anguish by reason of which plaintiff has expended large sums of money for medical care and attention to his/her injuries and will in the future incur such further obligations; further, plaintiff has been unable to attend to his/her normal affairs and duties and has lost thereby great gains and profits which he/she would have otherwise made and/or acquired.

WHEREFORE, the Plaintiff prays for judgment against each defendant, individually and severally, in a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), together with his/her costs in bringing this action.

Respectfully submitted,
LAW OFFICES OF STEPHEN G. PINTO, LTD.



Attorneys for Plaintiff

Michael S. Hedrick, Esq.
LAW OFFICES OF STEPHEN G. PINTO, LTD.
Attorneys for Plaintiff
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Chicago, Illinois 60602
(312) 726-3333
Attorney No. 35840

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)
Plaintiff,)
-vs-)
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SCHNEIDER NATIONAL CARRIERS,)
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)
Defendants.)

SUPREME COURT RULE 222 AFFIDAVIT OF DAMAGES

The undersigned being first duly sworn upon oath, deposes and states that he is the attorney for the plaintiffs in the above titled cause of action seeking money damages or collection of taxes, and states that cause of action,

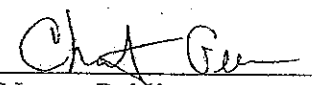
_____ DOES NOT EXCEED \$50,000.00

 X DOES EXCEED \$50,000.00

LAW OFFICES OF STEPHEN G. PINTO, LTD.


Michael Hedrick, Esq.

Subscribe and sworn to
before me this 4TH day of MARCH, 2009.


Notary Public

